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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	No. 23-cr-17-LM
)	
v.)	Count 1: Wire Fraud
)	(18 U.S.C. § 1343)
ANDREW MAHN,)	Count 2: False Statement in Passport Application
)	(18 U.S.C. § 1542)
Defendant.)	
_____)	

SUPERSEDING INFORMATION

The United States Attorney Charges:

COUNT ONE

[18 U.S.C. § 1343 – Wire Fraud]

Background

1. Company A was a multinational corporation headquartered in Chicago, Illinois.
2. Among other products, Company A sold two-way radios.
3. Company A allowed customers to unlock additional software features on certain radios by paying a fee. Company A referred to these additional features as “entitlements.”
4. Company A maintained computer servers in the Northern District of Illinois that were used to support its sales.
5. Company A restricted access to its computer network to employees, and required a username, password, and multi-factor authentication to log in. The multi-factor authentication process typically entailed an employee receiving a text message on his or her cell phone with a unique code or a push notification to be input during the log in process to Company A’s network.

6. Individual 1 was an employee of Company A who worked in the Northern District of Illinois.

The Scheme and Artifice to Defraud

7. Beginning no later than August 7, 2020, and continuing through no earlier than October 25, 2020, in the Northern District of Illinois and elsewhere, the defendant,

ANDREW MAHN,

knowingly devised and intended to devise a scheme and artifice to defraud Company A, and to obtain money, funds, and property belonging to Company A by means of materially false and fraudulent pretenses, representations, and promises.

8. As part of the scheme, MAHN sent fraudulent spear-phishing emails to Company A employees asking them to click on a link that purported to be an official Company A website. However, the defendant had created a false website designed to appear like a Company A website to steal Company A employees' usernames and passwords.

9. MAHN then sent Company A employees text messages to obtain authentication codes to gain unauthorized access to Company A's network.

10. Once inside the network, MAHN downloaded a Company A software tool that allowed him to unlock an unlimited number of Company A radios. Company A normally sold these software features at a price of up to \$175 per radio.

The Offense

11. On or about September 28, 2020, in the Northern District of Illinois and elsewhere, for the purpose of executing the above-described scheme and artifice to defraud, the defendant,

ANDREW MAHN,

caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals. Specifically, the defendant sent a text message from a location outside Illinois to Employee 1 in the Northern District of Illinois requesting Employee 1's multi-factor authentication code to access Company A's network.

All in violation of Title 18, United States Code, Section 1343.

COUNT TWO

[18 U.S.C. § 1542 – False Statement in Passport Application]

12. On or about November 15, 2022, in the District of New Hampshire and elsewhere, the defendant,

ANDREW MAHN,

knowingly and willfully made a false statement in an application for a passport with intent to induce and secure for his own use or the use of another the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated claimed his name was A.M. and provided an incorrect date of birth, which statements he knew to be false.

All in violation of Title 18, United States Code, Section 1542.

Dated: November 7, 2023

JANE E. YOUNG
UNITED STATES ATTORNEY

By: /s/ Alexander S. Chen
Alexander S. Chen
John J. Kennedy
Assistant U.S. Attorneys